

**PLEASE TAKE NOTICE** that January 16, 2024 or as soon thereafter as counsel may be heard, pursuant to F.R.C.P. 37 and upon the Brief In Support of Motion for Sanctions and accompanying certification, and upon all prior proceedings, pleadings, and filings in this Action, Plaintiff will move before the Honorable Cathy L. Waldor, United States Magistrate Judge for the District of New Jersey, at the United States Courthouse for District of New Jersey, Martin

Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ, 07102, Court Room  
4D, for an Order imposing sanctions on defendant, ACU Plasmold, Inc.

Dated: December 11, 2023

Respectfully Submitted,

By: /s/ Michael Cukor  
Michael Cukor, Esq.  
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*Attorneys for Plaintiff  
Vision Industries Group, Inc.*

### **CERTIFICATE OF SERVICE**

On December 11, 2023 served a copy of this motion and accompanying brief and certification  
on all counsel of record using the Court's ECF system.

By: /s/ Michael Cukor

Michael Cukor, Esq.  
**MCGEARY CUKOR LLC**

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